



May 19, 2020

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912
(617) 918-1102

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I am requesting copies and/or access to records held at EPA's Region 1 office. Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Clean Air Act (CAA), the Toxic Substances Control Act (TSCA), the Clean Water Act (CWA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of Industrial Plating Company, now known as Induplate, located in North Providence, Rhode Island.¹ Records show that Induplate operated under a variety of names at this location.

Company Information

Industrial Plating was located at One Greystone Avenue in North Providence from about 1932 until about 1974. The entity then is believed to have changed its name to Induplate and moved to building 107 at the former Brown & Sharpe plant located at 140 Waterman Avenue in North Providence. Induplate may have kept the One Greystone Avenue address though it may have changed the address to One Greystone Drive and used the 140 Waterman Avenue address as well. Alternate names for this entity include:

- Industrial Plating Company
- Induplate, LLC
- U.S. Ring Traveler Company
- Rhode Island Tool Company
- Greystone Incorporated

¹ This request may have some overlap with an earlier History Associates' request for regulatory documents concerning Brown & Sharpe submitted on August 19, 2019 (EPA-R1-2019-008241). Please note that this new request for regulatory materials on Industrial Plating/Induplate is based on additional research and new materials received from the Rhode Island Department of Environmental Management.

Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

RCRA Related Documents

The RCRA Generator ID number for Induplate is believed to be RID 001195387, used first starting in about 1983 with the name U.S. Ring Traveler Company, followed by use believed to begin around 1990 with the Induplate name, and possibly with the Greystone name. RIDEM wrote to EPA Region 1 to request such a generator ID number in or about May 1983.

Induplate is reportedly continuing to operate at One Greystone Drive in North Providence, and is believed to have operated continuously at this location since 1974 until the present. We have located some RCRA documents from RIDEM such as manifests, biennial reports, and inspection reports. This request seeks all documents from 1980 forward referring or relating to Induplate and U.S. Ring Traveler in connection with the Resource Conservation and Recovery Act (RCRA) programs, including notifications of hazardous waste activity, manifests, inspection, reports, biennial reports, and any informal or formal enforcement proceedings.

AIR Requested Documents

We understand that Industrial Plating Company/Induplate at One Greystone Avenue, North Providence, RI operated under the regulation of the Clean Air Act. Based on documentation received from the Rhode Island Department of Environmental Management (RIDEM), we know that the Industrial Plating Company/Induplate submitted six applications to RIDEM for air pollution control equipment on October 30, 1973 and was regularly inspected by RIDEM and the US EPA since the 1970s. The facility had a number of chromium plating lines, as well as other metal plating activities. The facility may have been identified by the ID# RI0000004400701006.

We understand that these applications, as well as subsequent applications, permits, inspections, and any enforcement activity, may have been reviewed, discussed, and coordinated with EPA Region 1. We therefore request the following documents related to this facility, including but not limited to, materials related to the above permits, inspections, consultation, and enforcement:

- Air permit registration and application documents
- Inspection files
- Any sampling or monitoring results
- Any enforcement files
- Any available correspondence

TSCA PCB Requested Documents

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at Industrial Plating Company/Induplate at 1-2 Greystone Avenue, One Greystone Drive, and/or 140 Waterman Avenue, North Providence, RI. There were electrical transformers located in this factory complex. We therefore request the following documents related to PCBs and this site:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving this party, (under its various names) and these locations

Clean Water Act and NPDES Requested Documents

We understand that Industrial Plating Company (also known as Induplate) at One Greystone Avenue, One Greystone Drive, and/or 140 Waterman Avenue, North Providence, RI operated under the regulation of the Clean Water Act, which required point source dischargers of pollutants to obtain a discharge permit through the National Pollutant Discharge Elimination System (NPDES). Industrial Plating/Induplate was assigned the facility ID numbers RI0021571 and RIG250006. Induplate is believed to have sought permits at least for a cooling water discharge and possibly for a stormwater discharge.

Induplate is also believed to be an indirect discharger, discharging process waste water to the publicly-owned treatment works (POTW), a POTW now run by the Narraganset Bay Commission (NBC). As a metal plater, Induplate is believed to be subject to categorical pretreatment standard, to be imposed by the POTW

We therefore request the following documents related to this facility or facilities at these locations:

- NPDES registration and permit application files
- Inspection files
- Correspondence files
- Discharge monitoring reports
- Any pretreatment permit issued by the POTW, in this case believed to be NBC and its predecessor agency
- Any other documents relating to the these facilities' discharge to the municipal sewers including monitoring reports, inspections, bypass or upset notifications, enforcement, documents, or other documents relating to these indirect dischargers and discharges to the POTW.

EPCRA-Related Documents

Induplate, under its various names, is believed to be subject to EPRCA section 313 Toxic Release Inventory (TRI) reporting requirements. This request seeks all such reports filed by Induplate (under its various names) relating to these locations, from the 1987 reporting year

forward. This request also seeks any formal or informal enforcement action related to this facility's EPCRA compliance, as well as any EPA, RIDEM, or other correspondence concerning this facility's EPCRA compliance.

Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at HBergen@historyassociates.com.

Sincerely,

Hilary Bergen